

Mark C. Hansen (*pro hac vice*)
Michael J. Guzman (*pro hac vice*)
David L. Schwarz (CA Bar No. 206257)
KELLOGG HANSEN TODD FIGEL &
FREDERICK, P.L.L.C.
1615 M Street, N.W., Suite 400
Washington, D.C. 20036
TEL: (202) 326-7900
mhansen@kellogghansen.com
mguzman@kellogghansen.com
dschwarz@kellogghansen.com

Attorneys for Defendants Huh, Pritzker, and Valani

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: JUUL LABS, INC., MARKETING,
SALES PRACTICES, AND PRODUCTS
LIABILITY LITIGATION

Case No. 19-md-02913-WHO

THIS DOCUMENT RELATES TO:

*San Francisco Unified School District v.
JUUL Labs, Inc., et al.*, Case No. 3:19-cv-
08177-WHO

**DECLARATION OF MICHAEL J.
GUZMAN IN SUPPORT OF THE
NON-MANAGEMENT DIRECTOR
DEFENDANTS' RESPONSE TO THE
COURT'S JANUARY 28, 2025, ORDER**

1 I, MICHAEL J. GUZMAN, declare:

2 1. I am a partner at the law firm of Kellogg, Hansen, Todd, Figel & Frederick,
3 P.L.L.C., and counsel to Defendants Nicholas Pritzker, Riaz Valani, and Hoyoung Huh
4 (collectively, the “Non-Management Directors”). I am admitted to practice before this Court *pro*
5 *hac vice*. I make this declaration based on my own personal knowledge. If called upon to testify,
6 I could and would testify competently to the truth of the matters stated herein.

7 2. I submit this declaration in support of the Non-Management Directors’ Response to
8 the Court’s January 28, 2025, Order, ECF No. 4374. The Non-Management Directors have
9 redacted the highly sensitive personal information of third parties and confidential business
10 information in accordance with the Order.

11 3. In addition to this Declaration, attached to the Response to the Court’s January 28,
12 2025, Order are the following:

13 a. Attached as Exhibit A is a true and correct copy of the redacted version of
14 Exhibit 24 to the Non-Management Director Defendants’ Motion for
15 Summary Judgment Against San Francisco Unified School District, filed
16 under seal at ECF No. 3385-1 and at ECF No. 3387-23;

17 b. Attached as Exhibit B is a true and correct copy of the redacted version of
18 Exhibit 35 to the Non-Management Director Defendants’ Motion for
19 Summary Judgment Against San Francisco Unified School District, filed
20 under seal at ECF No. 3385-2 and at ECF No. 3387-37; and

21 c. Attached as Exhibit C is a true and correct copy of the redacted version of
22 Exhibit 29 to the Non-Management Director Defendants’ Motion for
23 Summary Judgment Against San Francisco Unified School District, filed
24 under seal at ECF No. 3387-28.

1 I declare under penalty of perjury that the foregoing is true and correct. Executed this 19th
2 day of March 2025 in Washington, D.C.

3 /s/ Michael J. Guzman

4 Michael J. Guzman

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